

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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WILLIAM J. WAGNER,

Plaintiff,

-vs-

CHIARI & ILECKI, LLP,

Defendant.

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**NOTICE OF CROSS-MOTION  
FOR SUMMARY JUDGMENT**

Docket No. 15-cv-633-FPG

**MOTION MADE BY:**

Defendant, CHIARI & ILECKI, LLP, by its attorneys,  
CONNORS LLP.

**DATE, TIME, & PLACE  
OF HEARING:**

On a date and time specified by the Court, before the  
Hon. Frank P. Geraci, Jr., in the United States  
District Court for the Western District of New York,  
at 100 State Street, Rochester, New York 14614.  
Oral argument is requested.

**SUPPORTING PAPERS:**

Declaration of Paul A. Woodard, Esq., with exhibits;  
Declaration of William Ilecki, Esq.; Declaration of  
Melissa Overbeck, Esq., with exhibits; Declaration of  
Karen Sandford, with exhibits; Declaration of  
Kristian Brown, with exhibit; Statement of Material  
Undisputed Facts; Response to Plaintiff's Statement  
of Undisputed Facts; Memorandum of Law;  
defendant's papers submitted in opposition to  
plaintiff's motion in limine (Doc. 19); and all other  
papers and proceedings in this action.

**RELIEF REQUESTED &  
GROUNDS FOR RELIEF:**

An Order of this Court granting defendant summary  
judgment on each of plaintiff's claims and dismissing  
this action in its entirety, with prejudice, pursuant to  
Rule 56 of the Federal Rules of Civil Procedure.

**REPLY PAPERS:**

Defendant intends to file and serve reply papers.

DATED: Buffalo, New York  
March 2, 2017

s/Paul A. Woodard  
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Paul A. Woodard, Esq.  
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